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September 11, 2020

Heather Casillas
Bureau of Reclamation
BDO-300, 801 I Street, Suite 140
Sacramento, CA 95814
E-mail hcasillas@usbr.gov

RE: Reclamation's Proposed Revisions to 1993 and 2003 CVPIA Guidelines

Dear Ms. Casillas,

Thank you for granting me an extension of the comment deadline following your public workshops on Proportionality and on the CVPIA True Up. As you know, I work with a number of organizations who are interested in the implementation of the CVPIA in Central Valley refuges, rivers, streams and in the Bay-Delta Estuary. It is my understanding that numerous stakeholders are writing to you directly to express their serious concerns with the U.S. Bureau of Reclamation's ("Reclamation's") proposed revisions to the Central Valley Project Improvement Act ("CVPIA") 1993 Interim Guidelines governing CVPIA accounting requirements and the 2003 Guidelines for CVPIA Program Accounting and Cost Recovery.

In fact it appears that the proposed changes could substantially reduce available funding for critical environmental programs supported by the CVPIA Restoration Fund and place additional burdens on the federal treasury and the California environment, including West Coast salmon runs and internationally protected migratory bird populations. Rather than rushing ahead to finalize these flawed and incomplete proposals before the presidential election, I urge Reclamation to withdraw the current proposals, consider all the comments received and the enormous environmental impacts of the current proposals, and work with stakeholders to craft a new plan that safeguards the CVPIA Restoration Fund and the important conservation programs it supports.

To ensure that comments are fully considered and included in your Administrative Record for this current proceeding, I am attaching copies of just some of the stakeholder comment letters raising concerns with the proposed revisions to CVPIA guidelines. I know that

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many other letters of concern have been submitted by fishing groups, Native American Tribes and others, so the attached packet is just a subset of stakeholder concerns with the proposals.

In light of the many unanswered questions and troubling outcomes expected from the proposed revisions to the 1993 Interim Guidelines governing CVPIA accounting requirements and 2003 Guidelines for CVPIA Program Accounting and Cost Recovery, I request that Reclamation withdraw its proposals and work with environmental stakeholders, State and local governments, and others to craft a plan that safeguards the CVPIA Restoration Fund and all of the important conservation programs it supports. Thank you for considering these comments.

Sincerely,

A handwritten signature in black ink, reading "Hamilton Candee". The signature is fluid and cursive, with the first name "Hamilton" and the last name "Candee" clearly distinguishable.

Hamilton Candee

Attachments